

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JULIA HUBBARD and KAYLA  
GOEDINGHAUS,

Plaintiffs,

v.

TRAMMELL S. CROW, JR., *et al.*  
Defendants.

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Case No. 5:23-cv-00580-FB

Judge: Hon. Fred Biery

Date Action Filed: May 8, 2023 (transferred)

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**SCHEDULING RECOMMENDATIONS**

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The parties recommend that the following deadlines be entered in the scheduling order to control the course of this case:

1. The parties shall complete ADR in compliance with Local Rule CV-88 by 60 days before the date initially set for trial. A motion objecting to ADR must be filed no later than 60 days before that deadline.

2. The Plaintiffs shall submit a separate written offer of settlement to each Defendant by March 13, 2024, and each opposing party shall respond, in writing, by April 12, 2024.

3. Plaintiffs shall file all motions to amend or supplement pleadings or to join additional parties by February 20, 2024 and Defendants shall do so by March 20, 2024.

4. Plaintiffs shall file their designation of testifying experts and shall serve on all parties, but not file the materials required by FED. R. CIV. P. 26 by 90 days before discovery deadline. Parties resisting claims for relief shall file their designation of testifying experts and shall serve on all parties, but not file the materials required by FED. R. CIV. P. 26 by 45 days

before discovery deadline. All designations of rebuttal experts shall be designated within 30 days of receipt of the report of the opposing expert.

5. An objection to the reliability of an expert's proposed testimony under Federal Rule of Evidence 702 shall be made by motion, specifically stating the basis for the objection and identifying the objectionable testimony, within 30 days of receipt of the written report of the expert's proposed testimony, or within 60 days of the expert's deposition, if a deposition is taken, whichever is later.

6. The parties shall complete all discovery on or before April 4, 2025. Counsel may by agreement continue discovery beyond the deadline, but there will be no intervention by the Court except in extraordinary circumstances, and no trial setting will be vacated because of information obtained in post-deadline discovery.

7. All dispositive motions shall be filed no later than 60 days after the discovery deadline. Dispositive motions and responses to dispositive motions shall be limited to 30 pages in length.

8. The trial date will be determined at a later date by the Court. The parties shall consult Local Rule CV-16 regarding matters to be filed in advance of trial. At the time the trial date is set, the Court will also set the deadline for the filing of matters in advance of trial.

9. All of the parties who have appeared in the action conferred as required by the federal rules of procedure concerning the contents of the proposed scheduling order between January 5 and February 2, 2024, and the parties have agreed as to its contents.

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DATED: February 2, 2024

Respectfully submitted,

By: /s/ Matthew W. Schmidt  
Matthew W. Schmidt\*  
116A Main Street  
Tiburon, California 94920  
Telephone: (202) 746-9110  
mwschmidt@gmail.com  
*Attorney for Plaintiffs*  
*\*Admitted Pro Hac Vice*

By: /s/ John G. Balestriere  
John G. Balestriere\*  
BALESTRIERE FARIELLO  
225 Broadway, 29th Floor  
New York, New York 10007  
Telephone: (212) 374-5401  
Facsimile: (212) 208-2613  
john.balestriere@balestrierefariello.com  
*Attorneys for Plaintiffs*  
*\*Admitted Pro Hac Vice*

/s/ Kenneth C. Stone  
Gerald E. Hawxhurst, TSB No. 24090636  
jerry@hawxhurstllp.com  
HAWXHURST LLP  
1301 S. Capital of Texas Hwy  
Building C, Suite 300  
Austin, Texas 78746  
Tel: (512) 522-4995  
Fax: (512) 522-4961

s/ Daniel J. Paret  
Daniel J. Paret, State Bar No. 24088181  
**WOOD, SMITH, HENNING & BERMAN, LLP**  
14860 Landmark Blvd., Suite 120  
Dallas, Texas 75254  
Tel: (469) 210-2054  
Fax: (469) 210-2051  
dparet@wshblaw.com  
*Attorney for Defendant Michael Scott Woods,*  
*M.D.*

GRAY REED  
Kenneth C. Stone, TSB No. 19296300  
London England, TSB No. 24110313  
1601 Elm Street, Suite 4600  
Dallas, Texas 75201  
Telephone: (214) 954-4135  
Facsimile: (214) 953-1332  
Email: kstone@grayreed.com  
lengland@grayreed.com  
*Attorneys for Defendant Trammell S. Crow*

/s/ Stephanie Richmond Roark

**STEPHANIE RICHMOND ROARK**

State Bar No. 24070498

sroark@hartlinebarger.com

**BRIAN S. RAWSON**

State Bar No. 24041754

brawson@hartlinebarger.com

**HOLLY NAEHRITZ**

State Bar No. 24083700

hnaehritz@hartlinebarger.com

**HARTLINE BARGER LLP**

8750 N. Central Expy., Suite 1600

Dallas, Texas 75231

Telephone: (214) 369-2100

Facsimile: (214) 369-2118

*Attorneys for Defendants RCI Hospitality Holdings, Inc. and Casey Grover*

/s/ Diane M. Doolittle

**QUINN EMANUEL URQUHART & SULLIVAN, LLP**

Diane M. Doolittle (pro hac vice)

dianedoolittle@quinnemanuel.com

555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, California 94065

Telephone: (650) 801 5000

Facsimile: (650) 801 5000

Matthew “Alex” Bergjans (pro hac vice)

alexbergjans@quinnemanuel.com

865 S. Figueroa Street, 10th Floor  
Los Angeles, California 90017

Telephone: (213) 443 3000

Facsimile: (213) 443 3100

Evan Pearson (Texas State Bar No. 24121403)

evanpearson@quinnemanuel.com

300 W. Sixth Street, Suite 210

Austin, Texas 78701

Telephone: (737) 667 6119

Facsimile: (737) 667 6110

*Attorneys for Defendant Coe Juracek*

/s/ Steven J. Berry

**STEVEN J. BERRY**

State Bar No. 02242550

**BERRY ODOM, LLP**

611 9th Avenue

Fort Worth, Texas 76104

Telephone: (817) 850-4200

Facsimile: (817) 546-3210

E-Mail: sberry@berryodom.com

**JAMES M. “JAMIE” PARKER, JR.**

State Bar No. 15488710

**NAMAN HOWELL SMITH & LEE, PLLC**

10001 Reunion Place, Suite 600

San Antonio, Texas 78216

Telephone: (210) 731-6364

Facsimile: (210) 785-2964

jparker@namanhowell.com

*Attorneys for Defendant Robert Pruitt*

/s/ Kurt S. Elieson

**Kurt S. Elieson**

Texas Bar No. 06521100

KurtE@CarpLawFirm.com

**CARPENTER & ASSOCIATES**

555 Republic Drive, Suite 510

Plano, Texas 75074

972-455-8700 – Tel.

972-767-5599 – Fax

*Attorney for Defendants Shawn Mayer and Jade Mayer*

/s/ Steve Dillawn

Steve Dillawn

**Germer Beaman & Brown PLLC**

**One Barton Skyway**

**1501 S Mopac Expy Suite A400**

**Austin, TX 78746**

Ph: 512.482.5176

Fax: 512.472.0721

sdillawn@germer-austin.com

*Attorney for Defendant Dr. Melissa Miller*

/s/CHRISTOPHER LEE LINDSEY

**CHRISTOPHER LEE LINDSEY**

Assistant Attorney General

State Bar No. 24065628

P. O. Box 12548, Capitol Station

Austin, Texas 78711

(512) 463-2157

(512) 370-9314 Fax

christopher.lindsey@oag.texas.gov

*Attorney for Defendant Texas Ranger Cody*

*Mitchell*

/s/ Indira J. Cameron Banks

Indira J Cameron Banks (*pro hac vice*)

Cameron Jones LLP

407 N Maple Dr., Grnd 1

Beverly Hills, CA 90210

indira@cameronjones.law


Tel: 424.757.0585

*Attorney for Defendant Dr. Benjamin Todd*

*Eller*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing “SCHEDULING RECOMMENDATIONS” was served on all counsel of record via ECF on February 2, 2024.

  
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Kyle Foltyn-Smith